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11 XX GLOBAL, INC. and JACQUES WEBSTER  
12

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION  
15

16 PJAM LLC,

17 Plaintiff,

18 vs.

19 XX GLOBAL, INC., JAQUES  
20 WEBSTER, and DOES 1-20, inclusive,  
21 Defendants.  
22

CASE NO.

**NOTICE OF REMOVAL OF  
ACTION**

**[28 U.S.C. § 1441(b) – Diversity]**

23 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

24 PLEASE TAKE NOTICE that Defendants XX Global, Inc. and Jacques  
25 Webster<sup>1</sup> (together, “Defendants”) hereby remove to this Court the state court action  
26 described below:

27 1. On March 20, 2018, an action was commenced in the Superior Court of  
28 the State of California, County of Los Angeles, entitled PJAM LLC, Plaintiff, vs.  
XX Global, Inc., Jaques Webster, and Does 1-20, inclusive, Defendants, as Case No.  
SC129025. A copy of the complaint is attached hereto as Exhibit “A.”

<sup>1</sup> Jacques Webster (p/k/a Travis Scott) was sued erroneously as “Jaques Webster.”

2. The first date upon which Defendants received a copy of the said complaint was April 3, 2018, when Defendants were served with a copy of the said complaint and a summons from the said court. A copy of the summons is attached hereto as Exhibit "B."

3. Defendants agreed to accept service of the summons and complaint via email. Copies of the Notices and Acknowledgments of Receipt, dated April 3, 2018, are attached as Exhibit "C."

4. All other pleadings, process and orders served on Defendants in the state court action are attached as Exhibit "D."

5. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332. This action is one which may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C. § 1441(b) in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs. The complaint seeks damages in excess of \$160,000.

6. Complete diversity of citizenship exists in that Plaintiff PJAM LLC is a New York corporation with its principal place of business in New York, Defendant XX Global, Inc. is a Delaware corporation with its principal place of business in Tennessee, and Defendant Jacques Webster (an individual) is a citizen of Texas.

DATED: April 16, 2018

KING, HOLMES, PATERNO &  
SORIANO, LLP

By: /s/ Howard E. King  
HOWARD E. KING  
MATTHEW J. CAVE  
Attorneys for Defendants  
XX GLOBAL, INC. and JACQUES WEBSTER